

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION	:	21 MC 101 (AKH)
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WORLD TRADE CENTER PROPERTIES LLC, et	:	
al.,	:	08 CIV 3722 (AKH)
	:	
Plaintiffs,	:	
	:	
v.,	:	
	:	
AMERICAN AIRLINES, INC., et al.,	:	
	:	
Defendants.	:	
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**UNITED'S STATEMENT OF UNDISPUTED FACTS
PURSUANT TO LOCAL RULE 56.1**

Pursuant to Local Civil Rule 56.1(a) of the United States District Court for the Southern District of New York, United Continental Holdings, Inc., (f/k/a UAL Corporation) and United Air Lines, Inc. (collectively "United") respectfully assert, in support of their Supplemental Motion for Summary Judgment Dismissing All Claims of the WTCP Plaintiffs Relating to 7 WTC, that the following material facts are not genuinely in dispute.

1. The damage to Building 7 of the World Trade Center ("7 WTC") resulted from hijackers intentionally crashing American Airlines Flight 11 (AA Flight 11) into One World Trade Center (also known as the North Tower) on September 11, 2001. (WTCP Complaint filed on April 7, 2008, 08 CIV 3722 ("WTCP Complaint"), at ¶ 1 and *passim*).

2. WTCP Plaintiffs have never alleged that the damages to 7 WTC were caused by the hijacking and intentional crash of United Flight 175.
3. On 9/11, AA Flight 11 was operated by American Airlines, Inc., (at ¶ 35) and departed from Boston's Logan International Airport from the American Airlines Terminal, B. (See WTCP Complaint and Nat'l Comm'n on Terrorist Attacks Upon the U.S., The 9/11 Commission Report, ¶ 2 (2004) (the "9/11 Commission Report"))).
4. The hijackers who boarded AA Flight 11 underwent security screening at American's checkpoint at Logan. (9/11 Commission Report, at p. 2).
5. United did not screen any of the AA Flight 11 hijackers and United's Air Carrier Standard Security Program ("ACSSP") only required it to screen passengers boarding flights operated by United. (United ACSSP, p. 10, Section I.B, entitled "APPLICABILITY").
6. On 9/11, United Airlines flights departing from Boston were operated from a different terminal, United's Terminal C at Boston's Logan International Airport. 9/11 Commission Report at 2, and Staff Monograph on the Four Flights and Civil Aviation Security (the "*Aviation Monograph*") at 18.

7. Passengers boarding United flights on 9/11 underwent security screening at United's Checkpoint at Logan. *Id.*

Dated: New York, New York
June 29, 2012

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